

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA

Title III

No. 17-BK-3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth.

ORDER GRANTING FIVE HUNDRED THIRTY-FIFTH
OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO
TO CLAIMS ASSERTED BY EMPLOYEES OF THE PUERTO RICO POLICE
DEPARTMENT FOR WHICH THE DEBTOR IS NOT LIABLE

Upon the *Five Hundred Thirty-Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims Asserted by Employees of the Puerto Rico Police Department for which the Debtor Is Not Liable* [ECF No. 22267] (the “Five Hundred Thirty-Fifth Omnibus Objection”),² filed by the Commonwealth of Puerto Rico (the “Commonwealth” or the “Debtor”), dated September 16, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtor, as more fully set forth in the Five Hundred Thirty-Fifth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundred Thirty-Fifth Omnibus Objection.

Hundred Thirty-Fifth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Five Hundred Thirty-Fifth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in Exhibit A to the Five Hundred Thirty-Fifth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been found to be claims for which the Debtor is not liable because the liabilities asserted therein have already been satisfied and released; and the Court having determined that the relief sought in the Five Hundred Thirty-Fifth Omnibus Objection is in the best interests of the Commonwealth, its creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Thirty-Fifth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Five Hundred Thirty-Fifth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to delete the Claims to Be Disallowed from the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 22267 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Five Hundred Thirty-Fifth Omnibus Objection

Five Hundred Thirty-Fifth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	ALVARADO TORRES, MIGUEL HC-02 BOX 10048 AIBONITO, PR 00705	05/18/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	14330	Undetermined*
Reason: Proof of Claim asserts liabilities associated with allegedly accrued, but unpaid, wages purportedly owed by the Puerto Rico Police Department. However, the Commonwealth's records show that claimant has already received payment for the back pay and executed a release, and Debtors are therefore no longer liable for the claim because it has been settled and released. Claim #14330 also contained on Exhibit A to the 362nd Omnibus Claims Objection for Reclassified Claims.						
2	BAEZ FEBUS, ROBIN P.O. BOX 141 BARRANQUITAS, PR 00794	05/17/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	14236	Undetermined*
Reason: Proof of Claim asserts liabilities associated with allegedly accrued, but unpaid, wages purportedly owed by the Puerto Rico Police Department. However, the Commonwealth's records show that claimant has already received payment for the back pay and executed a release, and Debtors are therefore no longer liable for the claim because it has been settled and released. Claim #14236 also contained on Exhibit A to the 362nd Omnibus Claims Objection for Reclassified Claims.						
3	COLLAZO NIEVES, JOSE A. P.O BOX 1739 ALBONITO, PR 00705	05/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	27268	Undetermined*
Reason: Proof of Claim asserts liabilities associated with allegedly accrued, but unpaid, wages purportedly owed by the Puerto Rico Police Department. However, the Commonwealth's records show that claimant has already received payment for the back pay and executed a release, and Debtors are therefore no longer liable for the claim because it has been settled and released. Claim #27268 also contained on Exhibit A to the 362nd Omnibus Claims Objection for Reclassified Claims.						
4	COLON ALVARADO, JANICE URB. SAN ANTONIO CALLE 9 H23 COAMO, PR 00769	05/14/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	11226	Undetermined*
Reason: Proof of Claim asserts liabilities associated with allegedly accrued, but unpaid, wages purportedly owed by the Puerto Rico Police Department. However, the Commonwealth's records show that claimant has already received payment for the back pay and executed a release, and Debtors are therefore no longer liable for the claim because it has been settled and released. Claim #11226 also contained on Exhibit A to the 362nd Omnibus Claims Objection for Reclassified Claims.						

Five Hundred Thirty-Fifth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
5	COLON BELEN, EDGARDO L. URB PASEO REAL #31 CALLE VICTORIA COAMO, PR 00769	06/27/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	55770	Undetermined*
Reason: Proof of Claim asserts liabilities associated with allegedly accrued, but unpaid, wages purportedly owed by the Puerto Rico Police Department. However, the Commonwealth's records show that claimant has already received payment for the back pay and executed a release, and Debtors are therefore no longer liable for the claim because it has been settled and released. Claim #55770 also contained on Exhibit A to the 362nd Omnibus Claims Objection for Reclassified Claims.						
6	COLON RODRIGUEZ, RAMON E HC-02 BOX 7114 OROCOVIS, PR 00720	05/17/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	13563	Undetermined*
Reason: Proof of Claim asserts liabilities associated with allegedly accrued, but unpaid, wages purportedly owed by the Puerto Rico Police Department. However, the Commonwealth's records show that claimant has already received payment for the back pay and executed a release, and Debtors are therefore no longer liable for the claim because it has been settled and released. Claim #13563 also contained on Exhibit A to the 362nd Omnibus Claims Objection for Reclassified Claims.						
7	COLON VEGA, LUIS A. CALLE JUAN SOTO #215 COMUNIDAD CARRASQUILLO CAYEY, PR 00736	05/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	26222	Undetermined*
Reason: Proof of Claim asserts liabilities associated with allegedly accrued, but unpaid, wages purportedly owed by the Puerto Rico Police Department. However, the Commonwealth's records show that claimant has already received payment for the back pay and executed a release, and Debtors are therefore no longer liable for the claim because it has been settled and released. Claim #26222 also contained on Exhibit A to the 362nd Omnibus Claims Objection for Reclassified Claims.						
8	CRUZ COLON, DANIEL HC1 BOX 4120 BARRANQUITAS, PR 00794	06/27/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	53446	Undetermined*
Reason: Proof of Claim asserts liabilities associated with allegedly accrued, but unpaid, wages purportedly owed by the Puerto Rico Police Department. However, the Commonwealth's records show that claimant has already received payment for the back pay and executed a release, and Debtors are therefore no longer liable for the claim because it has been settled and released. Claim #53446 also contained on Exhibit A to the 362nd Omnibus Claims Objection for Reclassified Claims.						

Five Hundred Thirty-Fifth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
9	ESPADA RIOS, NANCY I. P.O.BOX 850 AIBONOTO, PR 00705	05/14/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	13348	Undetermined*
	Reason: Proof of Claim asserts liabilities associated with allegedly accrued, but unpaid, wages purportedly owed by the Puerto Rico Police Department. However, the Commonwealth's records show that claimant has already received payment for the back pay and executed a release, and Debtors are therefore no longer liable for the claim because it has been settled and released. Claim #13348 also contained on Exhibit A to the 362nd Omnibus Claims Objection for Reclassified Claims.					
10	LORAN HERNANDEZ, CARMEN D. PO BOX 1684 OROCOVIS, PR 00720	06/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	33362	Undetermined*
	Reason: Proof of Claim asserts liabilities associated with allegedly accrued, but unpaid, wages purportedly owed by the Puerto Rico Police Department. However, the Commonwealth's records show that claimant has already received payment for the back pay and executed a release, and Debtors are therefore no longer liable for the claim because it has been settled and released. Claim #33362 also contained on Exhibit A to the 362nd Omnibus Claims Objection for Reclassified Claims.					
11	MIRANDA ZAYAS, NOEL NOEL MIRANDA ZAYAS RR1 BOX 12001 OROCOVIS, PR 00720	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	18930	Undetermined*
	Reason: Proof of Claim asserts liabilities associated with allegedly accrued, but unpaid, wages purportedly owed by the Puerto Rico Police Department. However, the Commonwealth's records show that claimant has already received payment for the back pay and executed a release, and Debtors are therefore no longer liable for the claim because it has been settled and released. Claim #18930 also contained on Exhibit A to the 362nd Omnibus Claims Objection for Reclassified Claims.					
12	TORRES RUIZ, JOSE A. 606 SALAMANCA URB.VILLA DEL CARMEN PONCE, PR 00716	05/18/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	34684	Undetermined*
	Reason: Proof of Claim asserts liabilities associated with allegedly accrued, but unpaid, wages purportedly owed by the Puerto Rico Police Department. However, the Commonwealth's records show that claimant has already received payment for the back pay and executed a release, and Debtors are therefore no longer liable for the claim because it has been settled and released. Claim #34684 also contained on Exhibit A to the 362nd Omnibus Claims Objection for Reclassified Claims.					
					TOTAL	Undetermined*